

Adam P. Segal, Esq., Nevada Bar No. 6120
Christopher M. Humes, Esq., Nevada Bar No. 12782
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
Telephone: (702) 382-2101
Facsimile: (702) 382-8135
Email: asegal@bhfs.com
chumes@bhfs.com

*Attorneys for Creditors, Trustees of the Construction Industry
and Laborers Joint Trust Funds*

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

SIX STAR CLEANING AND CARPET
SERVICES, INC.,

Debtor.

Case No. BK-S-13-18735-MKN

Chapter 7

**RESPONSE TO TRUSTEES INTERIM
STATEMENT (ECF NO. 311)**

Creditors, the Trustees of the Construction Industry and Laborers Joint Trust Funds (the “Trust Funds”), by and through their counsel of record, Adam P. Segal, Esq. and Christopher M. Humes, Esq., hereby file this Response to the Trustee’s Interim Statement (ECF No. 311).

The Trust Funds object to the Debtor’s continued efforts in aggressively litigating the case *Collins et al v. Laborers International Union of North America Local No 872 et al.*, 2:11-cv-00524-GMN-DJA. This litigation has been ongoing since 2011. It is a multiparty suit, in which numerous parties stand to gain or lose depending upon its outcome. Throughout the litigation, the Debtor has taken a substantial role in litigating this matter among the plaintiffs to that action—to little or no avail, as related to increasing the Debtor’s estate. As of now, the plaintiffs have been unsuccessful in court-compelled arbitration, and now rest their hopes of success on a motion to vacate the arbitrator’s decision. Effectively, the federal litigation is close to concluded with Debtor having been unsuccessful on its claims.

Given the fact that the Debtor seems to be taking a substantial role in litigating the matter when there are so many other plaintiffs who can take on the costs of the litigation, coupled with the

1 seeming futility of the case actually increasing the size of the estate, the Trust Funds will oppose
 2 any disbursement of attorney fees from the estate for the Debtor's continued efforts to further
 3 litigate this matter.

4 At the end of the day, the Trust Funds cannot sit idly by while the Debtor continues to
 5 whittle away the shrinking estate on attorney fees for a case that has low prospects of any return.
 6 Other parties can continue this litigation, if they so choose. But it should not be left to the Debtor
 7 to bear such a substantial amount of these litigation costs.

8 Accordingly, the Trust Funds respectfully request that no further attorney fees be disbursed
 9 for the litigation of the above referenced matter.

10 Based on the foregoing, the Trust Funds also respectfully request that they have 3 business
 11 days to respond to any motion to employ counsel made by the Trustee, prior to any disposition on
 12 such a motion.

13 Dated: April 13, 2021.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

/s/ Christopher M. Humes

Adam P. Segal, Esq., Nevada Bar No. 6120

Christopher M. Humes, Esq., Nevada Bar No. 12782

100 North City Parkway, Suite 1600

Las Vegas, Nevada 89106-4614

Telephone: (702) 382-2101

Facsimile: (702) 382-8135

*Attorneys for Creditors, Trustees of the Construction
 Industry and Laborers Joint Trust Funds*

CERTIFICATE OF SERVICE

I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP and that on April 13, 2021, I served a true copy of the foregoing **RESPONSE TO TRUSTEES INTERIM STATEMENT (ECF NO. 311) via CM/ECF System and E-Service** upon:

Dan M. Winder
3507 W. Charleston Blvd.
Las Vegas, NV 89102
winderdandocket@aol.com
Attorney for Debtor, Six Star Cleaning and Carpet Services, Inc.

Jacob L. Houmand, Esq.
Houmand Law Firm LTD.
9205 W. Russell Rd., Bldg 3, Suite 240
Las Vegas, NV 89148
jhoumand@houmandlaw.com
Attorney for Trustee, Lenard Schwartzer

U.S. Trustee
300 Las Vegas Blvd., So. Suite 4300
Las Vegas, NV 89101

☒ b. **BY U.S. MAIL** upon:

Abingdon Business Capital
900 East Hamilton Ave., Suite 100
Campbell, CA 95008

Allied Collection Services
Acct No 2467868-1
3080 S. Durango Dr., Suite 208
Las Vegas, NV 89117

CENTURY LINK
Acct No 309584889
P.O. BOX 2961
Phoenix, AZ 85062

Clark County Assessor's Office
Attn Bankruptcy Clerk
500 S Grand Central Pkwy
Las Vegas NV 89155

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101

Cox Communications
Acct No 0018610088739103
PO Box 53262
Phoenix, AZ 85072

Dept Employment, Training & Rehab
Employment Security Division
500 East Third St
Carson City, NV 89703-0030

Dept. of Employment, Training & Rehab
Acct No 260055
Employment Security Division
500 East Third St.
Las Vegas, NV 89173

Dept. of Taxation
Acct No 9125
2550 Paseo Verde Pkwy. #180
Henderson, NV 89074

Eagle Graphic Systems, Inc. dba Signs Now
6290 S. Pecos Rd. Suite 600
Las Vegas, NV 89120

Financial Corporation
Acct No 1997505-1
PO Box 20350
Austin, TX 78720

H&E Equipment
Acct No 1027612
11100 Mead Road #200
Baton Rouge, LA 70816

Internal Revenue Services
Acct No 2792
PO Box 1485566
Cincinnati, OH 45250

Moneytree
Acct No SF000337
PO Box 58363
Seattle, WA 98138

NCO Financial Systems
Acct No 9103
507 Prudential Road
Horsham, PA 19044

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
(702) 382-2101

1 Nevada Department of Taxation
2 Bankruptcy Section
3 555 E. Washington #1300
4 Las Vegas NV 89101

5 Nevada Energy
6 Acct No 3000272011519154285
7 PO Box 30086
8 Reno, NV 89520

9 Nvenergy
10 C/O Credit Bureau Central
11 Po Box 29299
12 Las Vegas, NV 89126

13 Perini Building Company
14 Acct No mccarrant3
15 5871 Spencer Street
16 Las Vegas, NV 89119

17 Rapid Cash
18 Acct No 0050-P-001631086
19 3611 North Ridge Road
20 Wichita, KS 67205

21 Signs Now
22 Acct No sixstar
23 6290 S. Pecos Rd. #600
24 Las Vegas, NV 89120

25 Southwest Linen Company
26 Acct No 8315
27 6335 Sunset Corporate Dr.
28 Las Vegas, NV 89120

Staples
Acct No 8315
PO Box 689020
Des Moines, IA 50368

Sunbelt Rentals
Acct No 528139
PO Box 409211
Atlanta, GA 30384

Sundance Plaza LLC
Acct No 3530301
6725 Via Austi Parkway #380
Las Vegas, NV 89119

Sunset Business Park, LLC
Acct No A-13-678669
625 S. Eighth St.
Las Vegas, NV 89101

Tower Group Companies
Acct No wcn0001529
PO Box 2474
Eagle, ID 83616

United Temps
Acct No sixstar
1550 South Indiana #300
Chicago, IL 60605

US Bank N.A.
Bankruptcy Department
PO BOX 5229
Cincinnati, Ohio 45201-5229

US Bank National Assoc
Acct No 0249
PO Box 5227
Cincinnati Ohio 45202

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Ebony Davis

An Employee of Brownstein Hyatt Farber Schreck, LLP